

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **Case No.: 08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
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**STIPULATION AND ORDER REGARDING AMENDED BRIEFING  
SCHEDULE FOR (I) MOTION OF TRINITY INVESTMENTS LIMITED  
TO COMPEL OUTSTANDING DISTRIBUTIONS ON ALLOWED,  
UNSATISFIED GUARANTEE CLAIMS, AND (II) AMENDED  
CROSS-MOTION TO ENFORCE THE LBHI PLAN AND OTHER  
ANCILLARY RELIEF FILED BY LEHMAN BROTHERS HOLDINGS INC.**

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**WHEREAS**, on March 22, 2016, Trinity Investments Limited (“**Trinity**”) filed the *Motion Of Trinity Investments Limited To Compel Outstanding Distributions On Allowed, Unsatisfied Guarantee Claims* [ECF No. 52309] (“**Trinity Motion**”) against Lehman Brothers Holdings Inc. (“**LBHI**”);

**WHEREAS**, the objection deadline for the Trinity Motion was originally April 4, 2016, the reply deadline was originally April 12, 2016, and the hearing date was originally April 14, 2016;

**WHEREAS**, pursuant to an agreement between Trinity and LBHI, which was approved by the Court, the objection deadline for the Trinity Motion was extended to April 18, 2016, and the hearing date was adjourned to May 10, 2016;

**WHEREAS**, on April 18, 2016, LBHI, as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, filed the *Objection By Lehman Brothers Holdings Inc. To Motion Of Trinity Investments Limited To Compel Outstanding Distributions On Allowed, Unsatisfied Guarantee Claims And Cross-Motion To Enforce The LBHI Plan And Other Ancillary Relief* [ECF No. 52537], which was

subsequently amended on April 20, 2016 [see ECF No. 52544] (“**LBHI Objection/Cross-Motion**”); and

**WHEREAS**, the undersigned counsel for LBHI and the undersigned counsel for Trinity have conferred and agreed to the following amended briefing schedule for the Trinity Motion and LBHI Objection/Cross-Motion.

**THEREFORE IT IS HEREBY STIPULATED AND AGREED**, by and between LBHI and Trinity, by their respective undersigned counsel, as follows:

1. The deadline for Trinity to file and serve a reply and objection in response to the LBHI Objection/Cross-Motion is May 16, 2016.

2. The deadline for LBHI to file and serve a reply in response to Trinity’s objection to the LBHI Objection/Cross-Motion is May 31, 2016.

3. The Court will hear arguments on the Trinity Motion and the LBHI Objection/Cross-Motion on the omnibus hearing date currently scheduled for June 2, 2016 at 10:00 a.m. pursuant to the *Notice of Rescheduling of June 14, 2016 Omnibus Hearing to June 2, 2016* [ECF No. 52632];

4. This stipulation and order is without prejudice to the rights of LBHI and Trinity to request any modifications to the amended briefing schedule herein upon mutual agreement of LBHI and Trinity.

Dated: May 9, 2016

By: /s/ Arthur Steinberg  
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*Counsel for Trinity Investments Limited*

**IT IS SO ORDERED:**

Dated: May 9, 2016  
New York, New York

/S/ Shelley C. Chapman  
UNITED STATES BANKRUPTCY JUDGE